

MEMO ENDORSED

Federal Defenders OF NEW YORK, INC.

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David E. Patton
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Southern District of New York
Jennifer L. Brown
Attorney-in-Charge

February 18, 2021

BY EMAIL AND ECF

The Honorable Valerie E. Caproni
United States District Judge
Southern District of New York
500 Pearl Street
New York, NY 10007

RE: United States v. Simmons, 08 Cr. 1280 (VEC)

Dear Judge Caproni:

I write on behalf of my client, Robert Simmons, with the consent of the Government, to respectfully request an adjournment of the scheduled dates in the above-referenced case.

As the Court has directed, the parties have been in discussions regarding a possible disposition of this matter. The parties have made progress toward a disposition and request an additional adjournment to finalize our discussions.

The new schedule would be: Defense briefing due March 9, 2021; Government response March 23; Sentencing submissions due April 6. We would ask the Court to schedule a sentencing date for a time after April 6 that is convenient for the Court. The government consents to this request.

Thank you for your time and consideration of this matter.

Cc: AUSA Peter Davis

Respectfully submitted,

/s/

Peggy Cross-Goldenberg
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Defendant's time to submit briefing is adjourned to **April 1, 2021**. The Government's response is due **April 15, 2021**. Sentencing submissions are due **May 3, 2021**. Sentencing is scheduled for **May 18, 2021, at 11:00 a.m.** The Court is unlikely to grant any further extensions, so the parties are strongly encouraged to reach a resolution before the new deadline of April 1, 2021.

SO ORDERED.


2/18/2021

HON. VALERIE CAPRONI
UNITED STATES DISTRICT JUDGE